



CRESPEL & DEITERS
GROUP



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Code of Conduct

Crespel & Deiters Group

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Foreword of the Crespel & Deiters Group management board

Family-run for six generations. A reliable partner for customers, employees, stakeholders, the economy and the region for over 160 years. A family company since 1858, operating worldwide, producing regionally with deep local roots. Obligations arise from our activities: towards the people with whom we work, the raw material, and towards nature, which form the basis for our products and the region in which we are an employer and economic factor. Obligations that we are happy to fulfil day after day as part of our responsibility. A key building block for this is that our business partners, our employees and society place their trust in us. And we have to earn this trust time and again. This applies equally to all employees – to staff, managers and the executive board. And for all of us, this means that laws, internal regulations, voluntary commitments and ethical principles always form the basis for our actions. This is also reflected in our corporate values of “responsibility, perseverance and progressiveness”. They make it clear that responsibility and integrity is one of the essential building blocks of our corporate culture: A clear guideline, which we consistently use as a basis. Compliance and integrity make us successful in the long term and make a contribution toward our group success. We therefore attach great importance to responsible business management and act responsibly towards our employees, business partners and society in general. And above all, we believe in the honesty and sincerity of our employees. In this Code of Conduct, you will find the most important principles of our lawful business conduct. It is not sufficient simply to be aware of these principles. Dear employee, it is also crucial for you to take these compliance rules to heart and, above all, to ensure that we all live and implement

them. In addition, our compliance guidelines provide us with assistance in reviewing our own actions and show us who we can contact if we have questions about compliance. Therefore, please familiarise yourself with the contents of our Code of Conduct and our Compliance Guidelines and comply with them in your daily work at all times. Discuss our Code of Conduct with your colleagues and, if you have any doubts or questions, do not hesitate to contact the management, your respective team leader and/or the contact persons in the Compliance Department, who will be happy to assist.

Finally, I have the following request: This is not just about formal compliance with legal requirements and rules, or about avoiding possible criminal actions in a corporate context. It is more important to us that each of us is actually convinced of our rules. Let's put our common values of responsibility, endurance and progressiveness into practice together. Because that is the most important thing!

Gustav Deiters
CEO Crespel & Deiters Group

1 | Our responsibility for compliance

Our corporate values of responsibility, perseverance and progressiveness set out the values by which we act in our daily work, both internally and externally. The success of the Crespel & Deiters Group crucially depends on all of us, i.e. the management board, leaders and each individual employee, conducting ourselves honestly, with integrity and ethically. This also means that we report and communicate internally and externally in a truthful, comprehensive and timely manner. Our common goal is to take responsibility for our Group and actions and to protect the reputation of the Crespel & Deiters Group. This also means that the rules that apply in the company are observed and adhered to by all of us at all times and everywhere. Our management and our leaders have a special and responsible role in this: They have a role model function and must prevent irregular behaviour in the company, protect their employees and represent the company with integrity both internally and externally.

This Code of Conduct serves us all as a binding guideline in our everyday work. It is supplemented by internal guidelines and regulations as well as contractual agreements. In the context of our business activities, we are also guided by the ten principles of sustainable business of the UN Global Compact and the core labour standards of the International Labour Organisation (ILO) and promote their implementation within the Group. Of course, we also comply with national and international legal regulation. This also means that we do not engage in activities based on fraud, embezzlement, extortion, theft, misappropriation or any other deliberate harm to the assets of our clients or third parties.





The principles laid down in this Code of Conduct apply to the entire Crespel & Deiters Group. They are binding for all employees, the executive bodies of those companies, irrespective of the management level or function in the company, temporary workers, freelancers, interns and consultants, as well as our business partners. They apply to every business process. Non-compliance with the Code of Conduct can lead to considerable damage, not only for our group of companies, but also for us as employees as well as for our business partners and our shareholders. Should local legal requirements in individual cases have stricter requirements than those laid down in this Code of Conduct, these shall take precedence.

Our Code of Conduct summarised in five general headings:

- **Conduct within the business environment**
- **Our responsibility as a member of society**
- **Conduct toward colleagues and employees**
- **Conduct within the company**
- **Protection of corporate values and handling information**

2 | Conduct within the business environment

2.1 | We uphold law and legislation

We comply with relevant local, national and international laws and regulations wherever we do business. This creates trust for business cooperation with our business partners. We also expect our customers, suppliers and other business partners to uphold the law in their business practices. All actions, contracts, measures and other processes are therefore subject to strict legality so that no damage is caused to the Crespel & Deiters Group.

2.2 | We do not tolerate corruption

We are committed to maintaining the highest standards in our global business activities and do not tolerate corruption. The Crespel & Deiters Group is not involved in any form of corruption and strictly rejects any transactions involving bribes. Under no circumstances do we offer or grant persons benefits that have the purpose of unlawfully influencing decisions or actions or also only appear to create this impression. Such benefits may also not be offered or granted by third parties (sales partners, representatives, consultants) on behalf of the Crespel & Deiters Group. Grants and payments made to officials or employees of authorities that have the purpose of accelerating or favouring prescribed administrative procedures or services, for example, are generally prohibited.





2.3 | We avoid conflicts of interest

We make sure that our own interests do not conflict with the interests of the Crespel & Deiters Group.

A conflict of interest arises when one's own interests conflict with those of the Crespel & Deiters Group. A conflict of interest arises when one's own interests conflict with those of the Crespel & Deiters Group. The Crespel & Deiters Group respects the private interests and activities of each employee, whereby they are fully loyal to the company. In fulfilling their professional obligations, our employees are guided only by the company's interests and always avoid activities that are contrary to the business interests or the fulfilment of these obligations. They therefore do not misuse their position, company information or property of the Crespel & Deiters Group for personal purposes or improper benefits of third parties. To avoid risks of conflict of interest or the appearance thereof, our employees are required to disclose any actual or potential conflict of interest to their respective supervisor – or the management board – so that they can decide on the handling of the conflict of interest.

2.4 | We are committed to fair and free competition

We achieve our business success through outstanding quality, performance, and fair and honest conduct in competition and not through restrictive business practices.

The Crespel & Deiters Group is committed to the existence of free and open markets. Compliance with the statutory rules and regulations for the promotion and protection of competition is self-evident to us and is unreservedly binding. We do not enter into any agreements with competitors to fix prices or terms of sale, to divide up markets, to restrict production or to influence the outcome of a tender or award procedure. We do not participate in prohibited agreements or cartels. We do not enter into agreements with competitors with the aim of restricting competition, nor do we engage in such acts. We expressly distance ourselves from any abuse of a dominant market position.

2.5 | We comply with all relevant export control, customs and tax regulations

We comply with all relevant export control and customs laws as well as sanction provisions that apply in the respective countries of our business operations. Export control laws can apply in connection with direct or indirect exports or imports from or into sanctioned countries. Violations of these laws and provisions can lead to drastic penalties, for instance fines as well as the exclusion of simplified import and export procedures (this means an interruption of the seamless delivery chain).

We expect from our partners and third parties that they also reliably comply with these obligations. The Crespel & Deiters Group does not enter into any business relationships with potential customers where there are misgivings or doubts in this regard. No business relations are established or conducted with persons and companies that have a criminal or terrorist background. What is more, we strictly comply with the restriction of payment transactions and other financial transactions with sanctioned persons, companies or organisations. Furthermore, we are committed to complying with all local anti-money laundering laws.

We are aware of our social responsibility in fulfilling the tax obligations of the Crespel & Deiters Group and are expressly committed to compliance with the national and international legal provisions applicable to us. We undertake to comply with all tax regulations applicable to us, neither to conceal important information, nor to illegally avoid the payment of taxes nor to obtain improper tax advantages. All employees are required to work cooperatively with the tax authorities to provide the tax information required by law.

3 | Our responsibility as a member of society

3.1 | We respect human rights and diversity

We are committed to ensuring that (human) rights, especially those of our workers, are respected and protected. Moreover, we are committed to ensuring that the products and services we produce are manufactured in a way that respects the human rights of third parties and the environment. The first starting point for this is our own business area. We are also committed to respecting human rights and environmental obligations throughout our supply chain and consider the protection of human rights as a key element.

3.1.1 | We condemn child labour

We condemn all forms of child labour. Therefore, we oppose any employment of children under the age at which compulsory education ends according to the law of the place of employment.³ In any case, the age of employment shall not be less than 15 years.⁴ Furthermore, we condemn the involvement of children under 18 years of age in the following:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and servitude, and forced or compulsory labour, including the forced or compulsory recruitment of children for use in armed conflict;
- Attracting, procuring or offering of a child for prostitution, the production of pornography or pornographic performances;⁶
- Attracting, procuring or offering a child to engage in illicit activities, in particular the production of and trafficking in drugs;⁷ as well as
- Work which, by its nature or the circumstances in which it is carried out, is likely to be harmful to the health, safety or morals of children.⁸



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3.1.2 | We oppose forced labour

We condemn all forms of forced labour; this includes any work or service that is required of a person under threat of punishment and for which he or she has not volunteered, for example as a result of debt bondage or human trafficking.⁹

3.1.3 | We condemn slavery

We condemn all forms of slavery,¹⁰ slave-like practices, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation.

3.1.4 | Protection and safety at work

We condemn the disregard of occupational health and safety obligations under the law of the place of employment if this creates the risk of accidents at work or work-related health hazards. In particular, we condemn:

- clearly insufficient safety standards in the provision and maintenance of the workplace, workstation and work equipment,
- the absence of appropriate protective measures to avoid exposure to chemical, physical or biological agents,
- the absence of measures to prevent excessive physical and mental fatigue, in particular through inappropriate work organisation in terms of working hours and rest breaks; and
- the inadequate training and instruction of workers.

³ See Article 7(2) of the International Labour Organisation ("ILO") Convention 138 concerning Minimum Age for Admission to Employment, 1973.

⁴ See Article 7(2) of the International Labour Organisation ("ILO") Convention 138 concerning Minimum Age for Admission to Employment, 1973.

⁵ See Article 3(a) of ILO Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999.

⁶ See Article 3(b) of ILO Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999.

⁷ See Article 3(c) of ILO Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999.

⁸ See Article 3(d) of ILO Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999.

⁹ See ILO Convention No. 29 on Forced and Compulsory Labour, 1990, and Article 8(3) of the International Covenant on Civil and Political Rights (ICCPR).

¹⁰ Compare Article 1 No. 1 of the Slavery Convention of 25 September 1926.



3.1.5 | We pay fair wages

We reject any withholding of a fair wage. Wages should always be sufficient to cover basic needs and provide some disposable income. The fairness of a wage is measured according to the minimum wage, which is determined in each case according to the law applicable at the place of employment.

3.1.6 | Environmental damage

We expect our leaders and employees to prevent any harmful soil contamination, water contamination, air pollution, harmful noise emission or excessive water consumption that

- significantly impairs the natural basis for the preservation and production of food,
- denies a person access to safe drinking water,
- hinders or destroys a person's access to sanitary facilities; or
- damages the health of a person.

3.1.7 | Observation of land rights

We condemn all forms of unlawful eviction and support the prohibition of unlawful deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters whose use forms the basis of a person's livelihood.

3.1.8 | Deployment of security guards

We will not engage and deploy private or public security guards if, due to lack of instruction or control on the part of the Company in the use of the security guards,

- the prohibition of torture and cruel, inhuman or degrading treatment is disregarded,
- life or limb is injured or
- the freedom of association and the freedom to organise are affected.

3.1.9 | Environmental agreements

We expect our managers and employees to comply with the Minamata Convention on Mercury, the PoP Convention on the Treatment of Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

3.2 | Product conformity, safety and quality standard

Countless people come into contact with our products every day. The Crespel & Deiters Group is responsible for eliminating, as far as possible, the risks, disadvantages and dangers to the health, safety, environment and assets of our customers or third parties resulting from the handling of these products. It is therefore not only an obligation, but also our claim to comply with the legal and official regulations and internal standards that apply to our products. Our products are always developed in accordance with legal requirements. This is to be ensured continuously and systematically through processes and structures, as well as through control, during the manufacturing processes. We ensure that appropriate measures can be initiated in good time in the event of any deviations that may occur.

A strong quality culture is important to the Crespel & Deiters Group and continuous improvement of the products is fully and continuously encouraged. Our sustainable, rule-compliant and value-oriented actions ensure the highest quality for all our products. Through our quality management system, we ensure compliance with international requirements, regulatory laws and applicable standards.



4 | Conduct toward colleagues and employees

4.1 | Equal treatment and non-discrimination

There is huge potential in the diversity of our employees. That is why we employ people with different backgrounds and experience out of conviction. We reject any form of unequal treatment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless it is justified by the requirements of the employment; unequal treatment includes, in particular, the payment of unequal remuneration for work of equal value. All employees of the Crespel & Deiters Group are called upon to create an atmosphere of respectful cooperation and to entirely oppose discrimination.

We deal with one another respectfully. This applies to colleagues and also to customers, suppliers and other partners. We treat each other with honour the dignity and personality of every employee. Our dealings with each other and with customers, suppliers and other partners are characterised by mutual respect, fairness, professionalism and openness.

4.2 | Freedom to organise

We recognise the right of all employees to form trade unions and employee representative bodies on a democratic basis within the framework of national regulations.

Close cooperation with employee representatives based on trust is a key component and proven cornerstone of our corporate policy. All our leaders and employees, regardless of their position in our company, are required to respect the right of our employees to associate or join trade unions and not to use the formation, joining or membership of a trade union as a reason for unjustified discrimination or retaliation. In addition, everyone respects the right of trade unions to operate freely and in accordance with the law of the place of employment.

4.3 | Protection and safety at work

We take the responsibility for the safety and health of our employees very seriously. The safety and health of our employees has the highest priority alongside the quality of our products and our economic success. We ensure occupational health and safety within the framework of the applicable national regulations and on the basis of the health and safety policy of the Crespel & Deiters Group. Each of our employees promotes health and safety in their work environment and complies with occupational health and safety regulations. Every manager is obliged to instruct and support his or her employees in the fulfilment of this responsibility.



5 | Protection of corporate values and handling information

5.1 | Property of the company

We protect our company's property, assets and business opportunities, including but not limited to know-how, patents, trademarks and working materials. These values have been created through the hard work and dedication of the employees of the Crespel & Deiters Group and form an integral part of the entrepreneurial actions and business activities of our group of companies. All employees of the Crespel & Deiters Group are obliged to handle the property and assets of the company expediently, sparingly and responsibly in every respect.

5.2 | Intellectual property and trade secrets

The Crespel & Deiters Group protects the value of its research and development work as well as the value and reputation of the company and its brands. We respect the existing and legally valid property rights of third parties. For an innovative company such as the Crespel & Deiters Group, it is essential to benefit from the outcome of its own developments and inventions and to cover the costs for future-oriented investments. These statutorily secured rights prevent third parties from using our intellectual property without our authorisation. In turn, we respect the applicable property rights as well as confidential information of third parties and undertake not to use or copy this without corresponding authorisation.

5.3 | Data protection and information security

We protect our company's information through confidentiality and also oblige our business partners to maintain confidentiality when we disclose business secrets to them. We protect the data of our employees and customers from unauthorised access and handle them with care in accordance with legal requirements and data protection laws. Documents and (digital) data carriers containing business secrets shall be processed in such a way that they are not accessible to unauthorised persons and are protected against damage and loss. We protect confidential and personal data through appropriate technical, organisational, procedural and contractual measures, in particular against unauthorised collection, use and processing.



6 | Compliance management system of the Crespel & Deiters Group

The Crespel & Deiters Group also has a compliance management system in place to identify and address compliance risks at an early stage. The elements of this system promote a positive compliance culture within the Crespel & Deiters Group and the compliance management system is designed to help all employees of the Crespel & Deiters Group during their professional activities to act with integrity and in compliance with the law.

7 | Compliance guidelines of the Crespel & Deiters Group

This Code of Conduct of the Crespel & Deiters Group serves as an umbrella, an upper set of principles for the compliance guidelines of the Crespel & Deiters Group. In our compliance guidelines, we examine the principles laid down in this Code of Conduct in more detail and show our employees how they can or should behave correctly in complicated matters.

8 | Supplier Code of Conduct

We value the relationships with our suppliers and are therefore fair, open and transparent in our dealings with them. In return, we expect our suppliers to follow the principles set out in this Code of Conduct and to share these values. We also expect our suppliers, when working with the Crespel & Deiters Group, to commit to upholding the principles set out in our Supplier Code of Conduct.

9 | Validity and communication

This Code of Conduct applies to all employees and companies of the Crespel & Deiters Group. The Code of Conduct is brought to the attention of employees in an appropriate manner and at specified intervals, and compliance is ensured.

10 | Whistleblower system of the Crespel & Deiters Group

Violations of laws or company regulations, such as the Code of Conduct, can be reported via the whistleblower system. The whistle-blowing system allows for internal reports as well as reports to the external ombudsman and protects the whistleblower. You can access our whistle blowing system at the following link: crespeldeitersgroup.hinweisgeben.eu.



11 | Contact persons

For further questions, all employees and also third parties (customers, suppliers, etc.) can contact the management board, their respective supervisor and the Compliance Department (legal-compliance@crespeldeitersgroup.com).





CREPEL & DEITERS
GROUP

Passionate about wheat. Since 1858.

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